

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Mylan N.V. Securities Litigation

Case No. 1:16-CV-07926 (JPO)

MYL Litigation Recovery I LLC.

vs.

Mylan N.V., *et al.*

Case No. 1:19-CV-01799 (JPO)

Abu Dhabi Investment Authority

vs.

Mylan N.V., *et al.*

Case No. 1:20-cv-01342 (JPO)

STIPULATION AND ORDER

WHEREAS, the above-captioned class action (the “Class Action”), *In re Mylan N.V. Securities Litigation* (No. 1:16-CV-07926-JPO), is substantially related to the above-captioned individual actions (the “Individual Actions”), *Abu Dhabi Investment Authority v. Mylan N.V. et al.* (No. 1:20-cv-01342-JPO) (“*ADIA*”) and *MYL Litigation Recovery I LLC. v. Mylan N.V. et al.* (No. 1:19-CV-01799-JPO) (“*MYL Litigation Recovery*” and, together with the Class Action and *ADIA*, the “Related Actions”);

WHEREAS, on July 17, 2020, this Court entered a Scheduling Order (Class Action ECF No. 149) and coordination order in the Related Actions (Class Action ECF No. 150);

WHEREAS, the parties appeared before this Court on September 21, 2020 regarding certain discovery disputes;

WHEREAS, this Court resolved a number of outstanding discovery disputes during the September 21, 2020 hearing;

WHEREAS, the parties in the Related Actions have continued to meet and confer regarding the proper scope of discovery in the Related Actions and have reached agreement on a search protocol for the Defendants' electronic document searches;

WHEREAS, Defendants have requested additional time to complete their production of documents pursuant to the agreed search protocol;

WHEREAS, Defendants have continued to produce documents in the Related Actions on a rolling basis; and

WHEREAS, in light of the Court's rulings at the September 21, 2020 hearing and the expanded scope of discovery in the Related Actions, the parties have met and conferred and agreed on a modified proposed schedule to govern the Related Actions.

IT IS HEREBY STIPULATED AND AGREED, by and among the parties, that the schedule in the Related Actions shall be amended as follows:

	Existing Deadline	New Deadline
Completion of Document Production	October 30, 2020	January 13, 2021
Close of All Remaining Fact Discovery	January 29, 2021	April 12, 2021
Initial Expert Disclosures	February 26, 2021	April 26, 2021
Rebuttal Expert Reports	March 26, 2021	May 24, 2021
Close of Expert Discovery	April 30, 2021	June 21, 2021
Dispositive Motions	May 28, 2021	July 19, 2021

The parties agree that they will not seek a further extension of the schedule concerning the production of documents absent good cause.

STIPULATED AND AGREED TO BY:

Dated: October 20, 2020

POMERANTZ LLP

by /s/ Jeremy A. Lieberman
 Jeremy A. Lieberman
 Austin P. Van
 600 Third Avenue, 20th Floor
 New York, New York 10016
 Tel: (212) 661-1100
 jalieberman@pomlaw.com
 avan@pomlaw.com

Lead Counsel for Lead Plaintiffs

CRAVATH, SWAINE & MOORE LLP

by /s/ David R. Marriott
 David R. Marriott
 Kevin J. Orsini
 Rory A. Leraris
 Worldwide Plaza
 825 Eighth Avenue
 New York, NY 10019
 Tel: (212) 474-1000
 dmarriott@cravath.com
 korsini@cravath.com
 rleraris@cravath.com

Counsel for Defendants

**ROBBINS GELLER RUDMAN & DOWD
LLP**

by /s/ Luke O. Brooks

Luke O. Brooks
Angel P. Lau
Erika Oliver
Ting H. Liu
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 231-1058
lukeb@rgrdlaw.com
alau@rgrdlaw.com
eoliver@rgrdlaw.com
tliu@rgrdlaw.com

**ROBBINS GELLER RUDMAN & DOWD
LLP**

Samuel H. Rudman
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: (631) 367-7100
srudman@rgrdlaw.com

*Counsel for Abu Dhabi Investment
Authority*

SO ORDERED.

Dated: October 21, 2020
New York, New York

ROLNICK KRAMER SADIGHI LLP

by /s/ Lawrence M. Rolnick

Lawrence M. Rolnick
Marc B. Kramer
Michael J. Hampson
Jennifer A. Randolph
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 597-2800
lrolnick@rksllp.com
mkramer@rksllp.com
mhampson@rksllp.com
jrandolph@rksllp.com

*Counsel for MYL Litigation Recovery
I LLC*



J. PAUL OETKEN
United States District Judge